

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

PIERRE BRAZEAU, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., et al.

Defendants.

Civil Action No. 1:21-cv-00751-RP

**MANOHAR K. RAO'S NOTICE OF
NON-OPPOSITION TO THE MOTION
OF MOHAMMAD BOZORGIS FOR
CONSOLIDATION OF RELATED
ACTIONS, APPOINTMENT AS LEAD
PLAINTIFF, AND APPROVAL OF
COUNSEL**

WANDA NEWELL, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., et al.,

Defendants.

Civil Action No. 1:21-cv-00760-RP

KATLYN K. REIN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., et al.

Defendants.

Civil Action No. 1:21-cv-00856-RP

MANOHAR K. RAO, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., et al.

Defendants.

Civil Action No. 1:21-cv-00971

Manohar K. Rao (“Rao”) hereby submits this notice to inform the Court that he does not oppose the lead plaintiff motion of Mohammad Bozorgis (Dkt. No. 25). Mr. Rao, however, remains willing and able to serve as lead plaintiff if the Court denies Mr. Bozorgis’ motion.

On October 26, 2021, Mr. Rao. filed a timely motion for consolidation, appointment as lead plaintiff, and approval of his selection of counsel. Dkt. No. 17. Eight similar motions were filed by other putative class members in this action, including Mr. Bozorgis. Dkt. No. 25.

The Private Securities Litigation Reform Act of 1995 (the “PSLRA”) provides a presumption that the “most adequate plaintiff” to represent the interests of class members is the movant that, among other things, has “the largest financial interest in the relief sought by the class.” 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I). Having reviewed the competing motions and supporting papers provided by the other movants seeking appointment as lead plaintiff, it appears that Mr. Bozorgis has the largest financial interest. *See* Dkt. No. 26-4 (claiming a loss of \$1,539,508.17). Mr. Rao appears to have the second largest financial interest of the remaining movants. *See* Dkt. No. 17-4 (claiming a loss of \$602,392.89). As such, Mr. Rao does not possess the “largest financial interest in the relief sought by the class” as required by the PSLRA, and does not oppose the lead plaintiff motion of Mr. Bozorgis.

However, if the Court determines that Mr. Bozorgis is incapable or inadequate to represent the class in this litigation, Rao remains willing and able to serve as lead plaintiff or as a class representative. By this Notice of Non-Opposition, Rao does not waive his rights to participate and recover as a class member in this litigation.

Dated: November 9, 2021

Respectfully submitted,

**AHMAD, ZAVITSANOS, ANAIPAKOS, ALAVI
& MENSING P.C.**

/s/ Sammy Ford IV

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Counsel for Manohar K. Rao

CERTIFICATE OF SERVICE

I hereby certify that on this day, November 9, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Sammy Ford IV
Sammy Ford IV